IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

TRUSTEES OF THE SUBURBAN TEAMSTERS)
OF NORTHERN ILLINOIS WELFARE AND)
PENSION FUNDS,)
)
Plaintiffs,)
v.)
) No. 07 C 1239
) Judge Shadur
I. V. TRUCKING, INC., an Illinois corporation,)
) Magistrate Judge Geraldine
) Soat Brown
Defendant.)

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS

OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its

attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move

for entry of a default judgment in sum certain as stated in this Complaint and the supporting

Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

- 1. Suit was filed on March 5, 2007 for collection of delinquent contributions, attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
- 2. Corporate service was made upon I. V. TRUCKING, INC., an Illinois corporation, on the Illinois Secretary of State on April 9, 2007 and a copy of the proof of service was filed with the court on April 11, 2007.
- 3. Defendant is now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$746.46 Pension \$1,425.29 Welfare \$925.00 Attorneys fees \$437.20 Court costs \$3,533.95 WHEREFORE, Plaintiff prays for the entry of judgment against Defendant, I. V. TRUCKING, INC.., an Illinois corporation and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS in the amount of \$3,533.75.

TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS

By:

one of Its Attorneys

JOHN J. TOOMEY ARNOLD AND KADJAN 19 W. Jackson Boulevard Chicago, Illinois 60604 (312) 236-0415